

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)**

IN RE: VIAGRA (SILDENAFIL CITRATE))	Case No.: 3:16-MD-02691-RS
)	MDL No.: 2691
MICHELE COVERT)	
)	Case No: 3:17-cv-03521
Plaintiff,)	
)	
v.)	<u>AMENDED SHORT FORM</u>
)	<u>COMPLAINT</u>
PFIZER, INC.)	
)	
Defendant.)	

Plaintiff, Michele Covert, incorporates by reference the Plaintiffs' Master Long Form Complaint filed with the United States District Court for the Northern District of California in the matter of *In re: Viagra (Sildenafil Citrate) Products Liability Litigation*. Plaintiff further shows the court as follows:

1. Plaintiff's Name:
 - a. Michele Covert
2. Name of party or deceased who ingested Viagra or Revatio (hereinafter, "Viagra"), and suffered injury, if different than Plaintiff:
 - a. Brian Covert
3. Name of additional or other Plaintiff, including loss of consortium plaintiffs (i.e. administrator, executor, guardian, conservator):
 - a. Michele Covert
4. Plaintiff's current city and state of residence:
 - a. Lisle, New York

5. District Court in which venue would be proper absent direct filing:
 - a. Middle District of Pennsylvania
6. City and state of Plaintiff or decedent when they were diagnosed with melanoma:
 - a. Great Bend, Pennsylvania
7. Approximate dates that the Plaintiff or decedent ingested Viagra:
 - a. Start date: April 24, 2012
 - b. Stop date: February 13, 2017
8. Date(s) that Plaintiff was diagnosed with melanoma
 - a. July 28, 2015
9. Date of death of decedent, if applicable:
 - a. August 6, 2019
10. Defendants against whom Complaint is made:
 - a. Pfizer, Inc.: ☒X
 - b. Other: ☐N/A
11. Counts in the Master Complaint brought by Plaintiffs:
 - a. Count 1 (Negligence): ☒X
 - b. Count 2 (Gross Negligence): ☒X
 - c. Count 3 (Negligence Per Se): ☒X
 - d. Count 4 (Unfair and Deceptive Trade Practices: Unfairness): ☒X
 - e. Count 5 (Unfair and Deceptive Trade Practices: Fraud): ☒X
 - f. Count 6 (Unfair and Deceptive Trade Practices: Unlawfulness): ☒X
 - g. Count 7 (Strict Liability – Defective Design): ☒X
 - h. Count 8 (Strict Liability – Failure to Warn): ☒X
 - i. Count 9 (Failure to Test): ☒X

- j. Count 10 (Breach of Express Warranty): ☒X__
- k. Count 11 (Breach of Implied Warranty): ☒X__
- l. Count 12 (Fraudulent Misrepresentation and Concealment): ☒X__
- m. Count 13 (Negligent Misrepresentation and Concealment): ☒X__
- n. Count 14 (Fraud and Deceit): ☒X__
- o. Count 15 (Willful, Wanton, and Malicious Conduct): ☒X__
- p. Count 16 (Unjust Enrichment): ☒X__
- q. Count 17 (Loss of Consortium): ☐N/A__
- r. Count 18 (Survival): ☒X__
- s. Count 19 (Wrongful Death): ☒X__
- t. Count 20 (Punitive Damages): ☒X__
- u. Other: ☐N/A_____

12. Jury Demand:

- a. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff(s) hereby demand a trial
by jury as to all claims in this actions: Yes: ☒X__ No ☐_____

Dated: October 23, 2019

Respectfully submitted,

By: /s/ Nicole L. Barber
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